

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MISSOURI PRIMATE FOUNDATION,
et al.,
Plaintiffs and
Counterclaim Defendants

Case No. 4:16 CV 2163 CDP

VS

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.

PRO SE MOTION TO COMPEL DISCOVERY

Defendant Tonia Haddix, submits this motion pursuant to Rule 37(a)(3)(B)(iv) of the Federal Rules of Civil Procedure, to compel the plaintiffs to produce documents responsive to defendant's Request for the Production of Documents.

I, Tonia Haddix, reached out to the counsel for the plaintiffs requesting that they turn over all exhibits and names of witnesses they intend to use at the upcoming evidentiary hearing. As the court has granted them the right to subpoena and present new evidence, it is in the interest of fundamental fairness that I have the ability to prepare. They refused to provide discovery, falsely claiming that the deadline had passed. (See attached emails)

I, Tonia Haddix, respectfully request that the court compel the plaintiff to produce all exhibits and names of witnesses that they intend to use at the hearing.

I certify that a copy of this motion was emailed to clerk Tiffani Tillman on 12/02/2021.

Tonia Haddix
1234 State Rd. CC
Festus, MO 63028
417-440-1351

Tonia Haddix